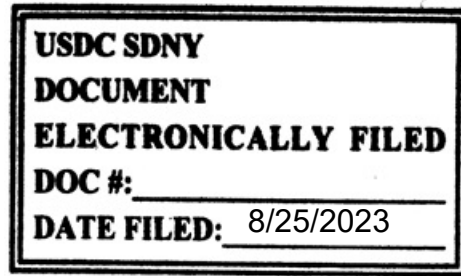




VIRGINIA
& AMBINDER LLP
A t t o r n e y s a t L a w



August 25, 2023

VIA ECF

Hon. Robert W. Lehrburger, U.S.M.J.
Southern District of New York
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Re: Trustees of the New York City District Council of Carpenters Pension Fund v. Theodore Williams Construction Company, LLC, 22 CV 9645 (GHW) (RWL)

Dear Magistrate Judge Lehrburger:

This firm represents the Plaintiff in the above-referenced case. We write jointly with counsel for the Defendant to request a 45-day stay of this matter through October 9, 2023. The parties have engaged in substantive settlement discussions and anticipate reaching an agreement in principal in short order. In light of this, it would not be prudent for the parties to expend resources on pre-motion letters and motion practice, and we believe that a stay will provide the time necessary to finalize the terms and obtain final approval from the Plaintiff's Board of Trustees.

Based upon the foregoing, we respectfully ask the Court to enter a stay through October 9, 2023. We thank the Court for its time and attention to this matter.

Sincerely,

The request is granted. The case is stayed until October 9, 2023, by which time the parties shall jointly file a status letter. The Court anticipates that the status letter will report that a settlement has been struck or that pre-motion letters will be filed by October 23, 2023.

VIRGINIA & AMBINDER LLP

/s/ Maura Moosnick
By: Maura Moosnick, Esq.
Attorneys for Plaintiff

DAVID HOROWITZ, P.C.

/s/ Christopher S. Joslin
By: Christopher S. Joslin, Esq.
Attorneys for Defendant

SO ORDERED:

8/25/2023

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE